

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SOFIYA GJANBOLAJ,

Plaintiff,

1:08-cv-03003 (DLC)

-against-

BRAUN DIVISION OF GILETTE,  
THE GILETTE COMPANY and  
PROCTER & GAMBLE COMPANY,

Defendant.

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**STIPULATION REMANDING MATTER TO STATE COURT**

**IT IS HEREBY STIPULATED AND AGREED**, by and between the below-named counsel for the parties to the above-captioned matter as follows:

**WHEREAS** this case was originally filed by plaintiff in the Supreme Court for the State of New York located in Kings County; and

**WHEREAS** this case involved parties who are diverse to each other; and

**WHEREAS** the defendants in this case removed this case to this Federal Court on the basis of diversity; but

**WHEREAS** the parties have stipulated that the amount in controversy, inclusive of interest and costs, does not exceed seventy-four thousand nine hundred ninety-nine dollars (\$74,999.00), and the plaintiff has agreed that under no circumstances shall any recovery in this matter exceed seventy-four thousand nine hundred ninety-nine dollars (\$74,999.00). (See Stipulation, attached hereto as **Exhibit “A”**).

It is therefore stipulated and agreed that it is appropriate that this matter be remanded to the Supreme Court of the State of New York for the County of Kings.

Dated: White Plains, New York  
June 9, 2008

GOLDBERG SEGALLA, LLP  
By: s/ Brian T. Stapleton, Esq.  
Brian T. Stapleton, Esq.  
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(914) 798-5400  
*Attorney for the Defendants*  
*The Gillette Company and Procter and*  
*Gamble Company*

IRINA P. VAIMAN, P.C.  
By: s/ Irina P. Vaiman, Esq.  
Irina P. Vaiman, Esq.  
1322 Gravesend Neck Road  
Brooklyn, New York 11229  
(718) 743-6611  
*Attorney for the Plaintiff*  
*Sofiya Gjanbolaj*

**SO ORDERED:**

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**Denise L. Cote, U.S.D.J.**

**CERTIFICATE OF SERVICE**

I hereby certify that on June 9<sup>th</sup>, 2008, a copy of the foregoing Stipulation was filed electronically and served by mail upon anyone unable to accept electronic filing. Notice of this filing was will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

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GS File No.: 12895.0026

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SOFIYA GIANBOLAJ,

Plaintiff,

08 Civ. 3003 (DLC)

-against-

BRAUN DIVISION OF GILLETTE,  
THE GILLETTE COMPANY and PROCTER & GAMBLE  
COMPANY,

Defendant.

**STIPULATION REMANDING MATTER TO STATE COURT**

IT IS HEREBY STIPULATED AND AGREED, by and between the below-named counsel for the parties to the above-captioned matter as follows:

WHEREAS this case was originally filed by the plaintiff in the Supreme Court for the State of New York located in Kings County; and

WHEREAS this case involves parties who are diverse to each other; and

WHEREAS the defendants in this case removed this case to this Federal Court on the basis of diversity; and

WHEREAS the parties have agreed that the amount in controversy, inclusive of interest, fees and costs, does not exceed SEVENTY-FOUR THOUSAND NINE HUNDRED NINETY-NINE DOLLARS (\$74,999.00); and

WHEREAS the plaintiff has agreed that under no circumstance shall any recovery in this matter, inclusive of interest, fees, and costs, exceed SEVENTY-FOUR THOUSAND NINE HUNDRED NINETY-NINE DOLLARS (\$74,999.00);

IT IS THEREFORE STIPULATED AND AGREED that

1. It is appropriate for this matter be remanded to the Supreme Court of the State of New York for the County of Kings;
2. A photocopy or facsimile of this completely executed Stipulation may be filed with the Court as having the full force and effect as if the original were so filed; and
3. This Stipulation may be executed in counterparts; each counterpart shall be treated as an original and all counterparts together shall constitute one and the same instrument; and
4. Such Stipulation may be entered by either party against the other without further notice to any other party.

Dated: White Plains, New York  
May 20, 2008

GOLDBERG SEGALLA, LLP

By: 

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By: 

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